



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

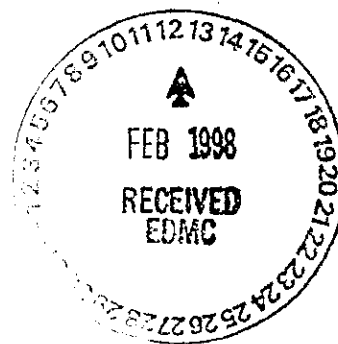
1315 W. 4th Avenue • Kennewick, Washington 99336-6018 • (509) 735-7581

January 26, 1998

Mr. David Langstaff
U.S. Department of Energy
P.O. Box 550, MSIN: R3-79
Richland, WA 99352

Mr. Malcolm Wright
Babcock & Wilcox Hanford Company
P.O. Box 1200, MSIN: L1-02
Richland, WA 99352

Mr. Gary McNair
Pacific Northwest National Laboratories
P.O. Box 999, MSIN: P7-79
Richland, WA 99352



Dear Messrs. Langstaff, Wright, and McNair:

Re: Notice of Correction Regarding September 18, 1997, Inspection of the 324 Building

The Washington State Department of Ecology's (Ecology) would like to thank the U.S. Department of Energy (USDOE), Babcock & Wilcox Hanford Company (BWHC), and Pacific Northwest National Laboratories (PNNL) personnel for their assistance during Ecology's September 18, 1997, inspection of the 324 Building. The inspection was conducted to determine the status of closure activities and current waste management practices within the 324 Building.

Findings from this inspection include the following violation of Washington Administrative Code (WAC) chapter 173-303, Dangerous Waste Regulations and four areas of concern. Please refer to the Corrective Measure listed in this letter for resolution of the violation cited below.

VIOLATION:

#1) WAC 173-303-170, Requirements for Generators of Dangerous Waste.

USDOE and PNNL failed to accurately designate waste per WAC 173-303-170 (1).

Constituents of waste accumulated in the biological laboratories in the 324 Building were inaccurately represented due to incorrect constituent calculations and use of inaccurate conversion tables, resulting in mis-designation of wastes per WAC 173-303-070 as referenced by WAC 173-303-170. As a result, dangerous wastes were shipped off-site either lacking appropriate waste codes and/or with incorrect waste codes applied.

CONCERNS:

#1) Designation of mixed waste stored in the Radiochemical Engineering Cells (REC) relies on limited historical data and process knowledge. Documentation supporting the process knowledge used to designate mixed wastes in the REC appears insufficient to accurately or comprehensively designate the wastes.

#2) Waste currently stored in D cell of the REC (strontium contaminated mixed wastes and contaminated process equipment) appear to be stored in lieu of disposal.

#3) Satellite accumulation areas within the Biological Laboratories in the 324 Building appear to be composed of multiple waste streams which would normally require individual satellite accumulation areas based on the point of generation of each waste stream. Also, the Hanford Site Wide Permit requires facilities to maintain a listing of satellite accumulation areas in use at each facility. Although Ecology appreciates particular issues of applying satellite accumulation requirements to laboratory operations, Ecology is concerned deviations from regulatory satellite accumulation requirements and Hanford Resource Conservation and Recovery Act (RCRA) Permit conditions have been instituted without consultation with the state.

#4) Satellite accumulation areas within the Biological Laboratories in the 324 Building must be secured when not attended. Ecology understands that the biological laboratories are not locked after hours nor are the satellite accumulation area tubs secured after hours. Satellite accumulation areas must be secured when not attended to prevent unintended additions of waste.

In order to correct the violation identified in this letter, please complete the following corrective measure within the time frames specified. Please be advised that failure to correct this violation

within the specified time frame may result in the issuance of an administrative order and/or penalty as authorized by the Revised Code of Washington, RCW 70.105.080 and 70.105.095. A request for additional time to complete the required corrective measure must be in writing and received by me for consideration no later than February 16, 1998.

CORRECTIVE MEASURE:

#1) WAC 173-303-170, Requirements for Generators of Dangerous Waste.

USDOE and PNNL must insure that procedures are in place to document how waste constituent data will be gathered, administered, and applied to all waste generated within the biological laboratories in the 324 Building for accurate designation per WAC 173-303-070. Within thirty (30) days of receipt of this letter, USDOE and PNNL must compile a listing of all containers of dangerous waste shipped off-site in 1997 for which designations have changed. This listing must include a description of the causes for the error in designation, a resolution of the error in designation, identity of the recipient of the waste, and a copy of notifications to waste recipients regarding changes in designations. This information must be compiled in a report and submitted to me within thirty (30) days of receipt of this letter.

RECOMMENDATIONS:

#1) USDOE and BWHC should delineate areas of uncertainty regarding the use of process knowledge in describing the wastes currently in storage in the REC with Ecology's 300 Area Project Manager, Ms. Jeanne Wallace. This delineation should be completed in a timely manner, as agreed to with Ms. Wallace, and include proposals for obtaining more comprehensive information regarding the wastes currently in storage in the REC.

#2) USDOE and BWHC should consult with Ecology's 300 Area Project Manager, Ms. Jeanne Wallace, to define waste removal scheduling and contractual proposals to demonstrate D cell wastes within the REC are not being speculatively accumulated. This demonstration should be completed in a timely manner as agreed to with Ms. Wallace.

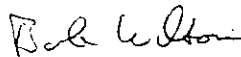
#3) USDOE and PNNL should present to Ecology any satellite accumulation strategies that do not meet either the regulatory requirements of WAC 173-303-200 or the conditions set forth for accounting of satellite accumulation in the Hanford Site Wide RCRA Permit prior to instituting such procedures within Hanford facilities. Flexibility exists within the satellite accumulation regulations so long as strict control of the waste is maintained. Such presentations may be made to Ms. Jeanne Wallace, Ecology's 300 Area Project Manager, or myself.

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#4) USDOE and PNNL should present to Ecology means of maintaining security of satellite accumulation areas in the biological laboratories at all times. While the laboratory is in use this is not a problem, however, when unattended the satellite accumulation areas should be secured to prevent unintended additions of waste to them. Such security may be demonstrated by either keeping the laboratory room locked after hours, by locking the satellite accumulation areas after hours, or by securing the satellite accumulation areas by some means that would indicate if they had been accessed after hours. Such presentations may be made to Ms. Jeanne Wallace or myself.

Please complete the attached Certificate of Compliance and return it to me by February 27, 1998. Do not hesitate to contact me at (509) 736-3031 if you have any questions regarding this letter.

Sincerely,



Bob Wilson, Compliance Inspector
Nuclear Waste Program

BW:ch
Enclosure

cc: Mary Burandt, USDOE
Gloria Williams, USDOE
Steve Szendre, FDH
George Hayner, BWHC
Harold Tilden, PNNL
Mary Lou Blazek, ODOE
Administrative Record: 324 Building

CERTIFICATE OF COMPLIANCE

As a legal representative of the U.S. Department of Energy, I certify to the best of my knowledge, the completion of items requested by the Washington State Department of Ecology on January 26, 1998, with regard to the inspection of the 324 Building located on the Hanford Site. Facility ID number WA 7890008967, as shown below.

COMPLIANCE STATUS

Corrective Measure	Date Due	Date Complete	Initials	Comments
#1	02/27/98			

Signature, USDOE-RL Representative

Date

bcc: Steve Alexander, Ecology
Moses Jaraysi, Ecology
Steve Moore, Ecology
Jeanne Wallace, Ecology